

**Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, D.C. 20554**

In the Matter of

Proposed National Thousands-Block
Number Pooling Roll-Out Schedule

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CC Docket No. 99-200

**REPLY COMMENTS OF AT&T WIRELESS SERVICES, INC.
ON NUMBER POOLING ROLLOUT SCHEDULE**

AT&T Wireless Services, Inc. ("AWS") hereby respectfully submits reply comments on the Commission's October 17, 2001 Public Notice seeking comments on its proposed national thousands-block number pooling rollout schedule.¹ As a commercial mobile radio services ("CMRS") provider, AWS is fully committed to implementing and participating in thousands block number pooling ("TBNP") by the November 2002 deadline for the CMRS industry. The Commission should recognize, however, the unique challenges that the CMRS industry faces in implementing TBNP next year, and recognize that it is critical to the smooth deployment of number pooling for the Commission to establish at this time a *final and fixed* national rollout schedule for the upcoming year 2002.

I. CARRIERS MUST BE ABLE TO RELY ON A FINAL SCHEDULE FOR POOLING

A number of parties urge the Commission to act quickly to establish a final pooling rollout schedule that the industry and states can rely upon in order to implement pooling and to make minimal subsequent modifications.² Other parties urge the Commission to take a more

¹ See Public Notice, *The Common Carrier Bureau Seeks Comment on the National Thousands-Block Number Pooling Rollout Schedule*, CC Docket No.99-200, DA 01-2419 (Oct. 17, 2001).

² See, e.g. CTIA comments at 3; Verizon Wireless comments at 1-2; *see also* Washington Util. and Transp. Commission comments at 2 (noting that the current dates for the Washington codes "should remain intact").

aggressive approach, by imposing a moratorium on additional state trials or disallowing state “opt-ins” beyond those already authorized.³ AWS believes that state input into the schedule is crucial, and supports the Commission’s decision in the *NRO Order* to permit states to opt into or opt out of the rollout schedule or petition to substitute alternative NPAs.⁴ The public notice affords states the promised opportunity to submit changes to the pooling schedule, and in response, several state commissions have requested modifications to, or filed petitions to substitute NPAs in, the Commission’s proposed national rollout schedule.⁵

Additional opportunity for modifications, however, must be limited in order to allow carriers and states notice and certainty in implementing pooling in an NPA. Specifically, AWS agrees with CTIA that the Commission should retain control and authority over the national rollout schedule for pooling to prevent “or at least minimize, further complications to the pooling rollout and avoiding jeopardizing the successful deployment of [pooling];”⁶ and that the national rollout schedule be fixed and certain at the outset of the first quarter for the year 2002. Given that the Commission has afforded states their opportunity to modify the rollout schedule within this comment period, AWS urges the Commission to address these state requests, and to finalize and close the window for modifying the proposed national rollout schedule at this time.

Such certainty is especially critical for the wireless industry, because it is devoting substantial resources to meeting the number pooling requirements next year. Although a constantly shifting rollout schedule will burden all pooling carriers (wireline and wireless) and

³ See, e.g., WorldCom comments at 2; Verizon comments at 2 (noting that the Commission concluded in its *Numbering Resource Optimization Order* that it will accommodate state requests to opt in, only where another state has opted out of the national schedule, and further where there are special circumstances), citing *Numbering Resource Optimization*, CC Docket No.99-200, Report and Order and Further Notice of Proposed Rulemaking, 15 FCC Rcd 7574 at paras. 163-65 (2000) (“*NRO Order*”).

⁴ See *NRO Order* at paras. 163-165.

⁵ CTIA comments at 3.

⁶ CTIA comments at 4.

impose risks to network reliability,⁷ a firm nationwide schedule is particularly important for wireless carriers, given the complexities and challenges associated with pooling for the wireless industry. In addition to the NPAs listed in the pooling schedule, the wireless industry must “catch up” and begin pooling in the approximately 150 plus NPAs participating in pooling trials by November 24, 2002.⁸ What this means is that wireless carriers will have to roll out pooling in many more NPAs than the 7 per month identified in the rollout schedule; according to some estimates, wireless carriers will need to roll out pooling in 20 NPAs *per month* – which is *almost three times* the 7 NPAs per month in which wireline carriers are required to implement pooling. Establishing finality in the national rollout will ensure that carriers are properly focusing their resources to meet certain deadlines and would greatly reduce further burdens and difficulties on the industry’s participation in pooling.

II. CONCLUSION

For the foregoing reasons, AWS requests that the Commission establish at this time a final and fixed national rollout schedule for the upcoming year 2002.

Respectfully submitted this 16th day of November 2001,

AT&T Wireless Services, Inc.

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⁷ See, e.g. CTIA comments at 3; Verizon Wireless comments at 1-2; WorldCom comments at 2; Verizon comments at 2.

⁸ CTIA comments at 2.